

Julie Metcalf Kinney  
William X Neitzche  
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Portland, Oregon 97217  
503-287-6494

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

FILED 30 NOV 18 13:58SUSDC-ORP

**William X Nietzche (solely as trustee for  
KRME International Trust),**

**William Kinney Jr.,**

**Julie Ann Metcalf Kinney,**

**3:18-CV-01930-SI**

**Plaintiff/Petitioner,**

**Case No.**

**PLAINTIFF'S MOTION FOR  
DEFAULT JUDGMENT AGAINST  
BARRISTERS SUPPORT SERVICES**

**v.**

**FREEDOM HOME MORTGAGE CORPORATION (FHMC),  
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS (MERS),  
BENEFICIAL OREGON INC. (BOI),  
HSBC HOLDINGS PLC (HSBC),  
REGIONAL TRUSTEE SERVICES CORPORATION (RTSC),  
MTGLQ INVESTORS L.P. (MTGLQ),  
RUSHMORE LOAN MANAGEMENT SERVICES (RLMS),  
U.S. BANK NATIONAL ASSOCIATION (USBNA),  
CLEAR RECON CORPORATION (CRC),  
BARRISTERS SUPPORT SERVICES (BSS),  
URBAN HOUSING DEVELOPMENT (UHD),**

**Et al.,**

**Defendant(s)/Respondent(s)**

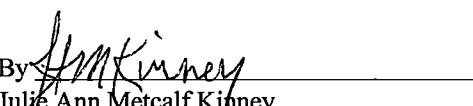
## PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

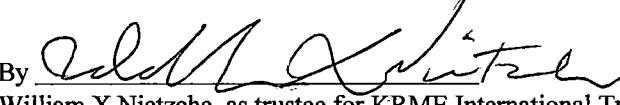
Plaintiff William and Julie Kinney ("The Kinney's"), by and through their son/trustee William X Nietzche, hereby moves the court for Default Judgment against defendant Barristers Support Services, stating in support:

1. On November 7, 2018, defendant Barristers Support Services was served with plaintiff's summons and Verified Complaint and Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction.
2. Defendant Barristers Support Services had 21 days to file a response to the summons and Verified Complaint.
3. As of this date defendant Barristers Support Services has failed to file any response to the summons and Verified Complaint.
4. The Return of Service affidavit signed by Darnell Tellis is in the file showing date of service of plaintiff's summons and Verified Complaint upon defendant Barristers Support Services.
5. The interest of justice and of the orderly administration of this court should result in entry of Default Judgment against defendant Barristers Support Services forthwith.

WHEREFORE, Plaintiffs move this Honorable Court of Record to enter Default Judgment against defendant Barristers Support Services.

RESPECTFULLY DATED this \_\_\_\_\_ day of November, 2018.

By   
Julie Ann Metcalf Kinney  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]

By   
William X Nietzche, as trustee for KRME International Trust  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]